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17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 LOS ANGELES WATERKEEPER,

20 Plaintiff,
21 vs.

22 ACCURATE STEEL TREATING, INC.,

23 Defendant.

24 Case No. 2:24-cv-07503-MWC-SSC

25 STIPULATED REQUEST FOR ORDER
26 EXTENDING DEADLINES SET BY COURT;
27 [PROPOSED] ORDER

28 *[Filed concurrently with Declaration of William
Carlon]*

1 **STIPULATION**

2 Pursuant to Local Rule 40-1 and the Court's standing order at paragraph 13, as supported
3 by the accompanying Declaration of William Carlon, Plaintiff Los Angeles Waterkeeper and
4 Defendant Accurate Steel Treating, Inc. through undersigned counsel hereby stipulate and
5 respectfully request that the Court extend all deadlines currently set by the Court by ninety (90)
6 days. The Parties declare in support of this request:

7 WHEREAS, on September 3, 2024, Plaintiff filed the complaint initiating this action (ECF
8 No. 1);

9 WHEREAS, on October 15, 2024, Defendant filed its answer (ECF No. 11);

10 WHEREAS, on November 8, 2024, the Parties filed their Rule 26(f) Report (ECF No. 18),
11 and on December 5, 2024, the Court issued its scheduling order (ECF No. 24);

12 WHEREAS, the Parties have been engaged in good faith settlement negotiations and have
13 exchanged several drafts of a consent decree;

14 WHEREAS, the Parties have made significant progress in reaching a settlement, and are
15 currently waiting on a technical consultant to provide the details of proposed Best Management
16 Practices;

17 WHEREAS, the Parties wish to continue the settlement discussions without expending
18 significant resources on conducting fact and expert discovery, and therefore the Parties agree to
19 seek a 90-day extension to all deadlines currently set by Court order.

20 WHEREFORE, the Parties hereby stipulate and respectfully request that the Court extend
21 all case deadlines as follows:

22 (1) The deadline for fact discovery be extended from September 12, 2025 to December
23 11, 2025;

24 (2) The deadline for initial expert disclosures be extended from September 19, 2025 to
25 December 18, 2025;

26 (3) The deadline for rebuttal expert disclosures be extended from October 3, 2025 to
27 January 1, 2025;

1 (4) The deadline for expert discovery be extended from October 17, 2025 to January 15,
2 2026;
3 (5) The last day to hear motions be extended from December 5, 2025 to March 5, 2026;
4 (6) The deadline to complete a settlement conference before a magistrate judge be
5 extended from December 19, 2025 to March 19, 2026;
6 (7) The deadline for the first round of trial filings be extended from January 30, 2026 to
7 April 30, 2026;
8 (8) The deadline for the second round of trial filings be extended from February 13, 2026
9 to May 14, 2026;
10 (9) The final pretrial conference and hearings on motions in limine be extended from
11 February 27, 2026 to May 27, 2026; and,
12 (10) The trial dates be extended from March 16, 2026 to June 15, 2026.

13 Dated: July 1, 2025

Respectfully Submitted,

14 LAW OFFICE OF WILLIAM CARLON

15 By: /s/ William N. Carlon

16 William N. Carlon
17 Attorneys for Plaintiff
18 LOS ANGELES WATERKEEPER

19 Dated: July 1, 2025

LEWIS BRISBOIS BISGAARD & SMITH LLP

Signature authority
granted via email
on July 1, 2025

20 By: /s/ Ryan Matthews

21 Ryan Matthews
22 Attorneys for Defendant
23 ACCURATE STEEL TREATING, INC.

24 **PURSUANT TO STIPULATION, AND GOOD CAUSE SHOWN, IT IS SO ORDERED.**

25 Dated: _____

26 Honorable Michelle W. Court
27 United States District Judge

1 **ATTESTATION**

2 Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all signatories listed, and
3 on whose behalf this filing is submitted, concur in the filing's content and have authorized the
4 filing.

5 Dated: July 1, 2025

LAW OFFICE OF WILLIAM CARLON

6 By: /s/ William N. Carlon

7 William N. Carlon
8 Attorneys for Plaintiff
9 LOS ANGELES WATERKEEPER